

UNITED STATES DISTRICT COURT

FEB - 1 2018

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

Ana Gabriela PEREZ-Garcia

DOB: 1990

Citizenship: Mexican

Case No. *M-18-0227-M**Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 31, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:*Code Section*

21 USC § 952

*Offense Description*Illegal Importation of a Controlled Substance / Approximately 24.44
Kilograms of Cocaine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.*Approved to file:**ANSA**Complainant's signature*

Mandy J. Davis, HSI Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/01/2018*2:32 am**Judge's signature*City and state: McAllen, Texas

U.S. Magistrate Judge Peter Ormsby

Printed name and title

Attachment "A"

I, Mandy J. Davis, am a Task Force Officer of the United States Homeland Security Investigations (HSI), and have knowledge of the following facts:

1. On January 31, 2018, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection Office of Field Operations at the Hidalgo Port of Entry (POE) in Hidalgo, Texas. CBP Officers (CBPOs) detained Ana Gabriela PEREZ-Garcia (hereafter PEREZ), a citizen of Mexico and B1/B2 visa holder, while attempting to enter the U.S. with approximately 24.44 kilograms (kg) of cocaine concealed within the gas tank of the Chevrolet Monte Carlo passenger car she was driving. The vehicle was registered to PEREZ.
2. During primary inbound inspection, CBP Officers (CBPOs) obtained a negative oral declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00. CBPOs referred PEREZ and the vehicle to secondary inspection due to its likeness to a posted lookout for an intensive examination.
3. During secondary inspection, CBPOs conducted a non-intrusive X-Ray inspection and discovered anomalies in the gas tank of the vehicle. A CBP K-9 narcotics detection team conducted a free air inspection which resulted in a positive alert for the odor of narcotics emanating from the vehicle.
4. A physical search of the vehicle discovered a trap door leading to the gas tank of the vehicle. Inside the gas tank, 20 vacuum sealed and cellophane wrapped packages were discovered. CBPOs field tested the substance inside the packages, which was positive for the characteristics of cocaine.
5. Homeland Security Investigations (HSI), Special Agents (SA) and a Task Force Officer (TFO) responded to the Hidalgo POE to assist in the investigation. HSI SAs and TFO interviewed PEREZ who (post-Miranda warning) denied any knowledge of the cocaine concealed within the vehicle. PEREZ gave inconsistent statements during the interview. PEREZ stated the vehicle was owned by her.
6. PEREZ will be charged with Illegal Importation of a Controlled Substance, in violation of 21 USC § 952.